



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

GMP:NDB  
F. #2016R00603/NY-NYE-759

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 21, 2020

By Hand and ECF

The Honorable Dora L. Irizarry  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Daniel E. Russo  
Criminal Docket No. 20-23 (DLI)

Dear Judge Irizarry:

Pursuant to the Court's April 15, 2020 Order, the government respectfully submits this letter, in connection with the above-referenced criminal matter. In light of the COVID-19 national emergency, the need to limit in-person contact, and Administrative Order 2020-06, the parties respectfully request that the status conference that had been scheduled in this case for April 27, 2020 be adjourned for several weeks and that time be excluded under the Speedy Trial Act from April 27, 2020 to the date the Court sets for the next status conference, due to the defendant's request for additional time to review the

discovery the government has produced, to prepare pretrial motions and in the interests of justice. The defendant, through counsel, consents to the waiver of this time under the Speedy Trial Act.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By:                     /s/                      
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